



State of Vermont
Enhanced 9-1-1 Board
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June 19, 2014

Marlene H. Dortch, Secretary,
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation - Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

The State of Vermont Enhanced 9-1-1 Board (Board) is providing this letter to enhance the record related to the text to 9-1-1 proceedings at the Federal Communications Commission.

Last November, the Board put a letter into the record to catalog Vermont's experience with text to 9-1-1 up to that point in time. We have had text to 9-1-1 service from Verizon since April, 2012 and ran a successful trial with Sprint later in that same year. In September, 2013, AT&T began

to provide text to 9-1-1 service as part of a trial. Following the start of that trial, we launched a public education campaign to inform the public about what was then 90% availability of text to 9-1-1 statewide. Last month, we completed the implementation with the nationwide carriers when Sprint and T-Mobile began to provide the service, and Vermont was the first state to have this important new service available statewide to over 98% of the wireless subscribers and visitors to Vermont. This letter captures the experience we've had with text to 9-1-1 since the first trial with Verizon Wireless in April, 2012 and the data is inclusive of what we reported last November.

As we said last November, we recognize that our experience may or may not be indicative of what others will experience. At the same time, what are emerging as patterns in the types of text contacts appears consistent with anecdotal evidence from other jurisdictions. As more and more jurisdictions launch text to 9-1-1, we will all learn more about this new way to interact with 9-1-1.

Since April of 2012, 588 texts to 9-1-1 have been processed and received. The majority or 329 of those texts were tests sent as part of the implementation of each new carrier. The 259

non-test texts break down as follows:

- 39 confirmed accidental texts where no emergency existed.
- 85 appeared to be accidental texts, but we were not able to confirm the status due to a lack of location information and/or because the individual did not respond when the call taker asked where their emergency was.
- 19 were contacts regarding a crime that were not deemed to be an emergency
- 11 were repeat texts from the same person that were not emergencies where we had to take action to stop the unnecessary texts (first and only confirmed incident of "spam").
- 4 that we suspected were "spam" but we were unable to confirm.
- 26 were continuations or follow ups to a previous text session reporting an emergency.
- 74 were legitimate emergencies that required some type of response. Those emergencies included auto accidents, burglaries, intruders, erratic driving, drug dealing, assaults and threats of assault. 8 were related to suicide threats and 8 involved domestic violence situations.
- 1 that remains unclassified.

We don't know if any of the texts came from individuals who are deaf, hard of hearing or have speech impairment.

It is clear that this is an important tool for individuals, such as domestic violence victims, to seek help. Based largely on feedback from other jurisdictions, we now think that the suicide incidents came in because the anonymous (relatively speaking) nature of text messaging allows some individuals who would not make a voice call to reach out via text.

Last fall, in anticipation of getting all four nationwide carriers on board, we worked with Intrado, our technology partner, to implement a back-up Public Safety Answering Point (PSAP) in case the original location became unavailable. The Williston and Derby PSAPs take turns each month being primary and backup so the call takers have the opportunity to participate and gain experience communicating via text.


We are looking at incorporating the ability to generate an outbound text session from the PSAPs so that we can do more follow up on messages where it is not clear whether an emergency exists. We also understand that the State of Indiana is now using outbound text capability to follow up on silent voice cell calls, and they have found that approach to be a successful use of text messaging as a majority of people will respond to text messages where they won't necessarily answer the phone if called back by a call taker. It saves the expenditure of resources where they might otherwise have sent the police to investigate.

We are continuing our public outreach but now are relying on social media advertising. We have an active Facebook page that is growing in use and the cost of advertising on social media, and especially the ability to direct those ads to certain demographic and age groups, make the use of social media an effective tool to help educate the public.

We are being careful to market this new service to those individuals who can most benefit: individuals who are deaf or hard of hearing or have speech impairment and individuals who are in a dangerous situation where making a voice call would put them in further danger. We have incorporated the "Call If You Can, Text If You Can't" slogan into a new logo for Vermont 9-1-1.

As we said last November, if we had this to do all over again, we would do it again. The concern about folks replacing voice calls with text has proven to be a non-issue. We have had a handful of unnecessary texting, and almost no incidents of spamming. We think that by emphasizing the slogan "Call if you can text if you can't", we've been able to communicate the message that text is not a replacement for voice calls. But for those who can't make a voice call, text to 9-1-1 has helped save lives and property.

Sincerely,


David H. Tucker
Executive Director
Enhanced 9-1-1 Board

